



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

August 20, 2019

**BY ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: ***Mohammad Salameh v. United States, 93 Cr. 180 (LAK)***

Dear Judge Kaplan:

The Government respectfully submits this letter requesting an extension to file its response to the defendant's motion for the return of property under Federal Rule of Criminal Procedure 41(g). The Government's position is that the defendant is not entitled to the return of several thousand dollars seized at the time of his arrest because he still owes millions of dollars in court-ordered restitution. The Government is making efforts to track down the whereabouts of the property at issue so that it can be applied to the defendant's restitution obligation. The Government expects that it will have more information soon and will be in a position to file its response to the Court within sixty days. For these reasons, the Government requests an additional sixty days to respond to the motion.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

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